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ATTORNEYS FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

ANN CARLATTA [sic],	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION NO. _____
BERTELSMANN, INC.; and RTL	:	
ADCONNECT, INC.,	:	
	:	
Defendants.	:	

**DEFENDANTS' RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Defendants Bertelsmann, Inc. and RTL AdConnect, Inc. submit this Corporate Disclosure Statement pursuant to Rule 7.1 of the Federal Rules of Civil Procedure:

1. Bertelsmann, Inc. is owned directly by its global parent, Bertelsmann SE & Co. KGaA (BSE).
2. RTL AdConnect, Inc. is owned by a privately-held parent, RTL US Holding, Inc., which in turn is owned by a series of privately-held U.S., E.U., and German entities affiliated with BSE.
3. Defendants are privately held entities and no publicly held corporation owns 10% or more of Defendants' stock.

Respectfully submitted,

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Dated: October 12, 2020

By: s/ Mary L. Moore  
Mary L. Moore

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4813-4846-6382, v. 1